STATE OF ILLINOIS COMMERCE COMMISSION 12 38 PH 101

COMMONWEALTH EDISON COMPANY	CHIEF CLERK'S OFFICE
Application of COMMONWEALTH EDISON COMPANY, for a Certificate of Public))
Convenience and Necessity, pursuant to Section 8-406 of the Illinois Public Utilities Act, and for an Order, under Section 8-503 of the Illinois Public Utilities Act, authorizing and directing ComEd to operate and maintain a substation in Cook County, Illinois.) No. 01-0276)))

MOTION FOR CONTINUANCE

Now come AGNES BESS, GRACE ERIKSON AND ARTHUR BESS, III, by their attorneys, Olson, Grabill, Hoffman & Flitcraft, and move for a continuance herein, and in support thereof state as follows:

- 1. Agnes Bess and Grace Erickson previously filed a pro se Petition to Intervene herein (the "Petition").
- 2. Commonwealth Edison ("ComEd") filed its Response to the Petition objecting to Agnes Bess and Grace Erickson appearing pro se herein and otherwise responding.
- 3. Agnes Bess and Grace Erikson retained counsel to represent them herein on Friday, June 22, 2001.
- 4. Pursuant to ruling entered herein on or about June 4, 2001, Agnes

 Bess and Grace Erikson were required to file their Reply to Commonwealth

 Edison's Response on June 22, 2001 and initial testimony of all parties was due to be filed by July 1, 2001.

- 5. Gregg Flitcraft, counsel for Petitioners, filed his appearance and a Motion for Continuance herein on Monday, June 25, 2001.
- 6. Petitioners' Motion for Continuance sought leave to file their Reply within 14 days.
- 7. Petitioners caused their Reply to be sent to the Commission for filing therewith14 days thereafter, on July 9, 2001.
- 8. Petitioners seek to file their initial testimony within 28 days hereof.

 WHEREFORE, AGNES BESS, GRACE ERIKSON AND ARTHUR BESS,

 111, move for:
 - A. Leave to file their initial testimony within 28 days;
 - B. A continuance of the hearing date herein; and
 - C. For such other relief as may be appropriate under the circumstances.

Agnes Bess, Grace Erikson and Arthur Bess, Hi

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